

Municipal Services Agency
Robert B. Leonard
Chief Deputy County Executive

Department of Transportation
Michael J. Penrose, Director



County Executive
Bradley J. Hudson

County of Sacramento

2012 DEC 10 P 3:35

CALIFORNIA BUILDING STANDARDS COMMISSION

December 10, 2012

Mr. Jim McGowan, Executive Director
State of California - State and Consumer Services Agency
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833-2936

Mr. McGowan,

Thank you for the opportunity to comment on the proposed code changes intended for inclusion in the 2013 California Building Code, Title 24, Part 2. The Sacramento County Department of Transportation (Sac DOT) has concerns related to the impacts on public rights of way, and safety created by certain proposed changes in "Section 11B-406 Curb Ramps". The specific sections that we have concerns with are noted below.

Text excerpt from the proposed 2013 CBC, **Section 11B-406.5.3 Landings**:

11B-406.5.3 Landings. *Landings shall be provided at the tops of curb ramps and blended transitions. The landing clear length shall be 48 inches (1219 mm) minimum. The landing clear width shall be at least as wide as the curb ramp, excluding any flared sides, or the blended transition leading to the landing. The slope of the landing in all directions shall be 1:48 maximum.*

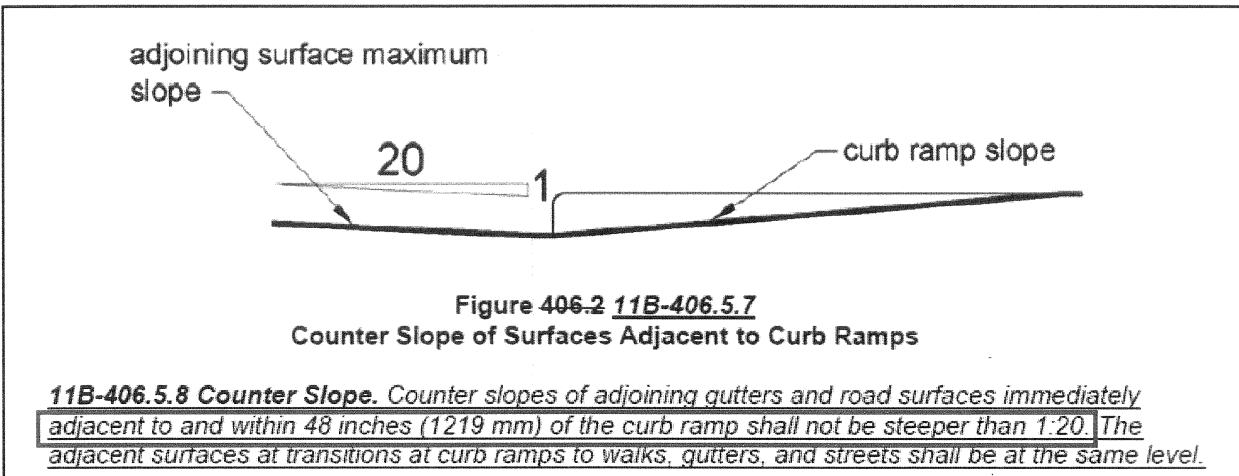
We have concerns with the slope requirement of a 48" landing at the top of a ramp to be 1:48 in all directions, this would be difficult to construct, excessively costly and unnecessary. Specifically we disapprove of the longitudinal slope requirement of 1:48, this should instead allow for the maximum 1:20 slope as allowed for accessible paths. Most of our sidewalks slopes match the grade of the adjacent street. We are currently able to provide a parallel curb ramp that goes from the sidewalk slope to a maximum slope of 1:12 for a parallel ramp. The requirement of a 48" top landing pad with a maximum longitudinal slope of 1:48 also creates complications with the normally constant curb height and the matching sidewalk surface. This 1:48 slope criteria will also create a costly transition compliance issue when an existing driveway is adjacent to, or near the top landing of a curb ramp. We recommend maintaining the 1:48 slope criteria for the cross slope (perpendicular to the curb) of the landing area and maintaining the currently allowed 1:20 for the longitudinal slope of the accessible path.



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Text excerpt from the proposed 2013 CBC, **Section 11B-406.5.8 Counter Slope:**



We have concerns with the 48" length of 1:20 slope requirement beyond the ramp slope extending across the gutter and into the road surface. Sac DOT has no objection in having this slope requirement apply to the concrete curb and gutter section adjacent to a curb ramp, but extending that requirement for the proposed 48" will impact the adjacent paved roadway. Roadway overlays and pavement reconstruction would include unreasonable costs for sculpting this adjacent pavement to ensure compliance. We recommend deleting the 48" length criteria but maintaining the requirement for a maximum slope of 1:20 for the adjoining surface slope.

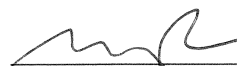
Text excerpt from the proposed 2013 CBC, **Section 11B-406.5.9 Clear Space:**

11B-406.5.9 Clear Space. Beyond the bottom grade break, a clear space 48 inches (1219 mm) minimum by 48 inches (1219 mm) minimum shall be provided within the width of the pedestrian street crossing and wholly outside the parallel vehicle travel lane. At marked crossings, the clear space shall be within the markings.

We have concerns with the requirement that the 48" by 48" clear space shall be provided beyond the bottom grade break of the curb ramp and "wholly outside the parallel vehicle travel lane". Many of our established streets do not have this shoulder space available without infringing on the currently designated travel lanes. This requirement could make many improvement projects cost prohibitive, since compliance would require purchasing additional rights of way for the relocation of sidewalk to provide a 48" shoulder that would serve as clear space.

Thank you Mr. McGowan, for your consideration of our concerns regarding the proposed 2013 CBC Code requirements.

Best regards,


Michael J. Penrose, Director
Department of Transportation



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